SMITH & LOWNEY, P.L.L.C.
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SEATTLE, WASHINGTON 98112
(206) 860-2883, FAX (206) 860-4187

March 11, 2015

Via Certified Mail - Return Receipt Requested
Managing Agent
Astro Auto Wrecking, LLC
37307 Enchanted Pkwy S.
Federal Way, WA 98003-7614

Re: **NOTICE OF INTENT TO SUE UNDER THE CLEAN WATER ACT AND REQUEST FOR COPY OF STORMWATER POLLUTION PREVENTION PLAN**

Dear Managing Agent:

We represent Waste Action Project, P.O. Box 4832, Seattle, WA 98194, (253) 639-7245. Any response or correspondence related to this matter should be directed to Smith and Lowney, P.L.L.C. at the letterhead address. This letter is to provide you with sixty days notice of Waste Action Project's intent to file a citizen suit against Astro Auto Wrecking, LLC ("Astro") under section 505 of the Clean Water Act ("CWA"), 33 U.S.C. § 1365, for the violations described below. This letter is also a request for a copy of the complete and current stormwater pollution prevention plan ("SWPPP") required by Astro's National Pollution Discharge Elimination System ("NPDES") permit.

Astro was granted coverage effective May 21, 2010, under the Washington Industrial Stormwater General Permit ("ISGP") issued by Ecology on October 21, 2009, effective January 1, 2010, modified May 16, 2012, effective July 1, 2012, and remaining effective through January 1, 2015, under NPDES Permit No. WAR011869 (the "2010 Permit"). Ecology granted coverage under the current iteration of the ISGP, issued by Ecology on December 3, 2014, effective January 2, 2015, and set to expire on December 31, 2019, (the "2015 Permit") and maintains the same permit number, WAR011869.

Astro has violated and continues to violate the terms and conditions of the 2010 Permit and 2015 Permit (collectively, the "Permits") with respect to operations of, and discharges of stormwater and pollutants from, its facility located at or near 37307 Enchanted Pkwy S, Federal Way, Washington 98003 (the "facility"). The facility subject to this notice includes any contiguous or adjacent properties owned or operated by Astro.

I. COMPLIANCE WITH STANDARDS.

A. Violations of Water Quality Standards.

Condition S10.A of the Permits prohibit discharges that cause or contribute to violations of water quality standards. Water quality standards are the foundation of the CWA and Washington's efforts to protect clean water. In particular, water quality standards represent the U.S. Environmental Protection Agency ("EPA") and Ecology's determination, based on scientific studies, of the thresholds at which pollution starts to cause significant adverse effects on fish or other beneficial uses. For each water body in Washington, Ecology designates the "beneficial uses" that must be protected through the adoption of water quality standards.

A discharger must comply with both narrative and numeric water quality standards. WAC 173-201A-010; WAC 173-201A-510 ("No waste discharge permit can be issued that causes or contributes to a violation of water quality criteria, except as provided for in this chapter."). Narrative water quality standards provide legal mandates that supplement the numeric standards. Furthermore, narrative water quality standards apply with equal force, even when Ecology has established numeric water quality standards. Specifically, Condition S10.A of the Permits require that Astro's discharges not cause or contribute to violations of Washington State's water quality standards.

Astro discharges stormwater to the East Fork Hylebos Creek, which is a tributary to the Hylebos Waterway, which flows to Commencement Bay in Puget Sound. Astro discharges stormwater that contains elevated levels of turbidity, total petroleum hydrocarbons, lead, zinc, and copper as indicated in the table of discharge monitoring data below. Discharges of stormwater from the facility cause and/or contribute to violations of water quality standards for turbidity, zinc, lead, copper, and aesthetic criteria and have occurred each and every day since May 21, 2010, on which there was 0.1 inch or more of precipitation, and continue to occur. These water quality standards include those set forth in WAC 173-201A-200(1)(e), -240, and -260(2). Precipitation data from each day since May 21, 2010, are appended to this notice of intent to sue and identify days when precipitation met or exceed 0.1 inches per day.

Table 1: Discharge Monitoring Data for Astro under 2010 Permit

Quarter for which data reported	Turbidity (Benchmark = 25 NTU)	pH (Benchmark = outside range of 5-9 su)	Zinc (Benchmark = 117 µg/L)	Copper (Effluent Limitation = 2.7 µg/L daily max)	Oil Sheen (Benchmark = N)	Lead (Benchmark = 81.6 µg/L)	Total Petroleum Hydrocarbons (Benchmark = 10 mg/L)
1Q 2011	**156**	7.6	**190**	**36**	N	**120**	**10.8**

Key: Bold = benchmark exceedances or effluent limitation violation; N = No

B. Compliance with Standards.

Condition S10.C of the Permits requires Astro to apply all known and reasonable methods of prevention, control and treatment ("AKART") to all discharges, including preparing and implementing an adequate SWPPP and best management practices ("BMPs"). Astro has violated and continues to violate these conditions by failing to apply AKART to its discharges by, among other things, failing to implement an adequate SWPPP and BMPs as evidenced by the elevated levels of pollutants in its discharge. *See* Table 1; Section II. These violations have occurred on each and every day since May 21, 2010, and continue to occur every day.

Condition S1.A of the Permits require that all discharges and activities authorized be consistent with the terms and conditions of the permit. Astro has violated this condition by discharging and acting inconsistent with the conditions of the Permits as described in this Notice of Intent to Sue.

II. STORMWATER POLLUTION PREVENTION PLAN VIOLATIONS.

Waste Action Project hereby provides notice, based upon information and belief, that Astro has not developed and implemented a SWPPP that complies with the requirements of the Permits. An inspection conducted by Ecology in March 2014, indicated that Astro has not developed nor implemented a SWPPP as required. In the following section, Waste Action Project provides notice of SWPPP violations on information and belief.

Condition S3.A.1 of the Permits require Astro to develop and implement a SWPPP as specified in these permits. Condition S3.A.2 of the Permits require the SWPPP to specify BMPs necessary to provide AKART and ensure that discharges do not cause or contribute to violations of water quality standards. On information and belief, Astro has violated these requirements of the Permits each and every day since May 21, 2010, and continues to violate them as it has failed to prepare and/or implement a SWPPP that includes AKART and BMPs necessary to comply with state water quality standards.

Condition S3.A of the Permits require Astro to have and implement a SWPPP that is consistent with permit requirements, fully implemented as directed by permit conditions, and updated as necessary to maintain compliance with permit conditions. On information and belief, Astro has violated these requirements of the Permits each and every day since May 21, 2010, and continues to violate them because its SWPPP is not consistent with permit requirements, is not fully implemented, and has not been updated as necessary.

The SWPPP fails to satisfy the requirements of Condition S3 of the Permits because it does not adequately describe BMPs. Condition S3.B.4 of the Permits requires that the SWPPP include a description of the BMPs that are necessary for the facility to eliminate or reduce the potential to contaminate stormwater. Condition S3.B.4 of the 2015 Permit requires that the SWPPP detail how and where the selected BMPs will be implemented. Condition S3.A.3 of the Permits requires that the SWPPP include BMPs consistent with approved stormwater technical manuals or document how stormwater BMPs included in the SWPPP are

demonstratively equivalent to the practices contained in the approved stormwater technical manuals, including the proper selection, implementation, and maintenance of all applicable and appropriate BMPs. Astro's SWPPP does not comply with these requirements because it does not adequately describe and explain in detail the BMPs selected, does not include BMPs consistent with approved stormwater technical manuals, and does not include BMPs that are demonstratively equivalent to such BMPs with documentation of BMP adequacy.

Astro's SWPPP fails to satisfy the requirements of Condition S3.B.2 of the Permits because it fails to include a facility assessment. The SWPPP fails to include an adequate facility assessment because it does not describe the industrial activities conducted at the site, the general layout of the facility including buildings and storage of raw materials, the flow of goods and materials through the facility, the regular business hours, and the seasonal variations in business hours or in industrial activities.

Astro's SWPPP fails to satisfy the requirements of Condition S3.B.1 of the Permits because it does not include a site map that identifies significant features, the stormwater drainage and discharge structures, the stormwater drainage areas for each stormwater discharge point off-site, a unique identifying number for each discharge point, each sampling location with a unique identifying number, paved areas and buildings, areas of pollutant contact associated with specific industrial activities, conditionally approved non-stormwater discharges, surface water locations, areas of existing and potential soil erosion, vehicle maintenance areas, and lands and waters adjacent to the site that may be helpful in identifying discharge points or drainage routes.

Astro's SWPPP fails to comply with Condition S3.B.2.b of the Permits because it does not include an inventory of industrial activities that identifies all areas associated with industrial activities that have been or may potentially be sources of pollutants. The SWPPP does not identify all areas associated with loading and unloading of dry bulk materials or liquids, outdoor storage of materials or products, outdoor manufacturing and processing, onsite dust or particulate generating processes, on-site waste treatment, storage, or disposal, vehicle and equipment fueling, maintenance, and/or cleaning, roofs or other surfaces exposed to air emissions from a manufacturing building or a process area, and roofs or other surfaces composed of materials that may be mobilized by stormwater as required by these permit conditions.

Astro's SWPPP does not comply with Condition S3.B.2.c of the Permits because it does not include an adequate inventory of materials. The SWPPP does not include an inventory of materials that lists the types of materials handled at the site that potentially may be exposed to precipitation or runoff and that could result in stormwater pollution, a short narrative for each material describing the potential for the pollutants to be present in stormwater discharge that is updated when data becomes available to verify the presence or absence of the pollutants, a narrative description of any potential sources of pollutants from past activities, materials and spills that were previously handled, treated, stored, or disposed of in a manner to allow ongoing exposure to stormwater as required. The SWPPP does not include the method and location of on-site storage or disposal of such materials and a list of

significant spills and significant leaks of toxic or hazardous pollutants as these permit conditions require.

Astro's SWPPP does not comply with Condition S3.B.3 of the Permits because it does not identify specific individuals by name or title whose responsibilities include SWPPP development, implementation, maintenance and modification.

Condition S3.B.4 of the Permits requires that permittees include in their SWPPPs and implement certain mandatory BMPs unless site conditions render the BMP unnecessary, infeasible, or an alternative and equally effective BMP are provided. Astro is in violation of this requirement because it has failed to include in its SWPPP and implement the mandatory BMPs of the Permits.

Astro's SWPPP does not comply with Condition S3.B.4.b.i of the Permits because it does not include required operational source control BMPs in the following categories: good housekeeping (including definition of ongoing maintenance and cleanup of areas that may contribute pollutants to stormwater discharges, and a schedule/frequency for each housekeeping task); preventive maintenance (including BMPs to inspect and maintain stormwater drainage and treatment facilities, source controls, treatment systems, and plant equipment and systems, and the schedule/frequency for each task); spill prevention and emergency cleanup plan (including BMPs to prevent spills that can contaminate stormwater, for material handling procedures, storage requirements, cleanup equipment and procedures, and spill logs); employee training (including an overview of what is in the SWPPP, how employees make a difference in complying with the SWPPP, spill response procedures, good housekeeping, maintenance requirements, material management practices, how training will be conducted, the frequency/schedule of training, and a log of the dates on which specific employees received training); inspections and recordkeeping (including documentation of procedures to ensure compliance with permit requirements for inspections and recordkeeping, including identification of personnel who conduct inspections, provision of a tracking or follow-up procedure to ensure that a report is prepared and appropriate action taken in response to visual monitoring, definition of how Astro will comply with signature and record retention requirements, certification of compliance with the SWPPP and Permit, and all inspection reports completed by Astro).

Astro's SWPPP does not comply with Condition S3.B.4.b.i.7 of the Permits because it does not include measures to identify and eliminate the discharge of process wastewater, domestic wastewater, noncontact cooling water, and other illicit discharges to stormwater sewers, or to surface waters and ground waters of the state.

Astro's SWPPP does not comply with Condition S3.B.4.b.ii of the Permits because it does not include required structural source control BMPs to minimize the exposure of manufacturing, processing, and material storage areas to rain, snow, snowmelt, and runoff. Astro's SWPPP does not comply with Condition S3.B.4.b.iii of the Permits because it does not include treatment BMPs as required.

Astro's SWPPP fails to comply with Condition S3.B.4.b.v of the Permits because it does not include BMPs to prevent the erosion of soils or other earthen materials and prevent off-site sedimentation and violations of water quality standards.

Astro's SWPPP fails to satisfy the requirements of Condition S3.B.5 of the Permits because it fails to include a stormwater sampling plan as required. The SWPPP does not include a sampling plan that identifies points of discharge to surface waters, storm sewers, or discrete ground water infiltration locations, documents why each discharge point is not sampled, identifies each sampling point by its unique identifying number, identifies staff responsible for conducting stormwater sampling, specifies procedures for sampling collection and handling, specifies procedures for sending samples to the a laboratory, identifies parameters for analysis, holding times and preservatives, laboratory quantization levels, and analytical methods, and that specifies the procedure for submitting the results to Ecology.

III. MONITORING AND REPORTING VIOLATIONS.

A. Failure to Collect Quarterly Samples.

Condition S4.B of the Permits require Astro to collect a sample of its stormwater discharge once during every calendar quarter. Conditions S3.B.5.b and S4.B.2.c of the Permits require Astro to collect stormwater samples at each distinct point of discharge offsite except for substantially identical outfalls, in which case only one of the substantially identical outfalls must be sampled. These conditions set forth sample collection criteria, but require the collection of a sample even if the criteria cannot be met.

Astro violated these requirements by failing to collect stormwater samples from each distinct point of discharge offsite in compliance with the requirements of the 2010 Permit during the following quarters:

2nd Quarter 2010
3rd Quarter 2010
4th Quarter 2010
2nd Quarter 2011
3rd Quarter 2011
4th Quarter 2011
1st Quarter 2012
2nd Quarter 2012
3rd Quarter 2012
4th Quarter 2012
1st Quarter 2013
2nd Quarter 2013
3rd Quarter 2013
4th Quarter 2013
1st Quarter 2014
2nd Quarter 2014
3rd Quarter 2014

4th Quarter 2014

Astro has also violated and continues to violate these conditions because it does not sample each distinct point of discharge off-site each quarter. These violations have occurred and continue to occur each and every quarter since May 21, 2010, that Astro was and is required to sample its stormwater discharges, including the quarters in which it collected stormwater discharge samples from some, but not all, points of discharge. These violations will continue until Astro commences monitoring all distinct points of discharge.

B. Failure to Analyze Quarterly Samples.

Condition S5.A.1 and 2 and S5.B.1 of the Permits requires Astro to analyze stormwater samples collected quarterly for turbidity, pH, total copper, total zinc, oil sheen, petroleum hydrocarbons, and lead.

Astro violated these conditions by failing to analyze stormwater samples for any of the required parameters during the following quarters:

2nd Quarter 2010
3rd Quarter 2010
4th Quarter 2010
2nd Quarter 2011
3rd Quarter 2011
4th Quarter 2011
1st Quarter 2012
2nd Quarter 2012
3rd Quarter 2012
4th Quarter 2012
1st Quarter 2013
2nd Quarter 2013
3rd Quarter 2013
4th Quarter 2013
1st Quarter 2014
2nd Quarter 2014
3rd Quarter 2014
4th Quarter 2014

C. Failure to Timely Submit Discharge Monitoring Reports.

Condition S9.A of the Permits require Astro to use DMR forms provided or approved by Ecology to summarize, report and submit monitoring data to Ecology. For each monitoring period (calendar quarter) a DMR must be completed and submitted to Ecology not later than 45 days after the end of the monitoring period. Astro has violated these conditions by failing to submit a DMR within the time prescribed for the following quarters:

2nd Quarter 2010

2nd Quarter 2011
2nd Quarter 2012
1st Quarter 2013
2nd Quarter 2013
3rd Quarter 2013
4th Quarter 2013
1st Quarter 2014
2nd Quarter 2014
3rd Quarter 2014
4th Quarter 2014

D. Failure to Comply with Visual Monitoring Requirements.

Condition S7.A of the Permits requires that monthly visual inspections be conducted at the facility by qualified personnel. Each inspection is to include observations made at stormwater sampling locations and areas where stormwater associated with industrial activity is discharged, observations for the presence of floating materials, visible oil sheen, discoloration, turbidity, odor, etc. in the stormwater discharges, observations for the presence of illicit discharges, a verification that the descriptions of potential pollutant sources required by the permit are accurate, a verification that the site map in the SWPPP reflects current conditions, and an assessment of all BMPs that have been implemented (noting the effectiveness of the BMPs inspected, the locations of BMPs that need maintenance, the reason maintenance is needed and a schedule for maintenance, and locations where additional or different BMPs are needed).

Condition S7.C of the Permits requires that Astro record the results of each inspection in an inspection report or checklist that is maintained on-site and that documents the observations, verifications, and assessments required. The report/checklist must include the time and date of the inspection, the locations inspected, a statement that, in the judgment of the person conducting the inspection and the responsible corporate officer, the facility is either in compliance or out of compliance with the SWPPP and the Permits, a summary report and schedule of implementation of the remedial actions that Astro plans to take if the site inspection indicates that the facility is out of compliance, the name, title, signature and certification of the person conducting the facility inspection, and a certification and signature of the responsible corporate officer or a duly authorized representative.

Astro is in violation of these requirements of Condition S7 of the Permits because, since May 21, 2010, it has failed to conduct each of the requisite visual monitoring and inspections, failed to prepare and maintain the requisite inspection reports or checklists, and failed to make the requisite certifications and summaries.

IV. CORRECTIVE ACTION VIOLATIONS.

A. Violations of the Level One Requirements of the Permits.

Condition S8.B of the Permits requires Astro take specified actions, called a "Level One Corrective Action," each time quarterly stormwater sample results exceed a benchmark value or are outside the benchmark range for pH. Condition S8.A of the 2015 Permit requires that Astro implement any Level One Corrective Action required by the 2010 Permit.

As described by Condition S8.B of the Permits, a Level One Corrective Action requires Astro: (1) review the SWPPP for the facility and ensure that it fully complies with Condition S3 of the 2010 Permit and contains the correct BMPs from the applicable Stormwater Management Manual; (2) make appropriate revisions to the SWPPP to include additional operational source control BMPs with the goal of achieving the applicable benchmark values in future discharges and sign and certify the revised SWPPP in accordance with Condition S3.A.6 of the 2010 Permit; and (3) summarize the Level One Corrective Action in the Annual Report required under Condition S9.B of the Permits. Condition S8.B.4 of the Permits requires that Astro implement the revised SWPPP as soon as possible, and no later than the DMR due date for the quarter the benchmark was exceeded.

Condition S5.A and Tables 2 and 3 of the Permits establish the following benchmarks: turbidity 25 NTU; pH 5 – 9 SU; total copper 14 µg/L; total zinc 117 µg/L; lead 81.6 µg/L; and petroleum hydrocarbons 10 mg/L.

Astro has violated the requirements of the Permits described above by failing to conduct a Level One Corrective Action in accordance with permit conditions, including the required review, revision and certification of the SWPPP, the required implementation of additional BMPs, and the required summarization in the annual report each time since May 21, 2010, that quarterly stormwater sampling results were greater than a benchmark or outside the benchmark range for pH, including the benchmark excursions listed in Table 1 in Section I.A. of this letter.

These benchmark excursions are based upon information currently available to Waste Action Project from Ecology's publicly available records. Waste Action Project provides notice of its intent to sue Astro for failing to comply with all of the Level One Corrective Action requirements described above by failing to conduct a Level One Corrective Action in accordance with permit conditions, including the required review, revision and certification of the SWPPP, the required implementation of additional BMPs, and the required summarization in the annual report each time since May 21, 2010, its quarterly stormwater sampling results were greater than a benchmark or outside the benchmark range for pH, including the benchmark excursions listed in Table 1 above.

V. EFFLUENT LIMITATIONS

Condition S6.C. of the Permits establishes a numeric effluent limitation for total copper concentrations in Astro's discharges of 2.7 µg/L because Astro discharges to a 303(d)-listed waterbody and Ecology set this site-specific effluent limitation for Astro at the time of permit coverage. Astro violated this effluent limitation in the 1st quarter of 2011 as indicated in Table I in section I.A. of this notice of intent to sue.

VI. VIOLATIONS OF THE ANNUAL REPORT REQUIREMENTS.

Condition S9.B of the Permits requires Astro to submit an accurate and complete annual report to Ecology no later than May 15 of each year. The annual report must include corrective action documentation as required in Condition S8.B through S8.D. If a corrective action is not yet completed at the time of submission of the annual report, Astro must describe the status of any outstanding corrective action. Specific information to be included in the annual report is identification of the conditions triggering the need for corrective action, description of the problem and identification of dates discovered, summary of any Level 1, 2, or 3 corrective actions completed during the previous calendar year, including the dates corrective actions completed, and description of the status of any Level 2 or 3 corrective actions triggered during the previous calendar year, including identification of the date Astro expects to complete corrective actions. Astro has violated this condition by failing to include all of the required information in the annual report it submitted for 2010 and 2012, and by failing to submit reports for 2011 and 2013.

The annual report submitted by Astro for 2010 (on April 27, 2011) does not include any of the required information. For example, the report does not describe any of the stormwater problems identified, identify benchmark exceedances, nor explain the corrective actions taken.

The annual report submitted by Astro for 2012 (on March 14, 2013) does not include any of the required information. The report does not describe any of the stormwater problems identified, identify benchmark exceedances, nor explain the corrective actions taken. For example, the report fails to explain that the owner refused to allow Ecology onto the facility for an inspection in November 2012.

VII. VIOLATIONS OF THE RECORDKEEPING REQUIREMENTS.

A. Failure to Record Information.

Condition S4.B.3 of the Permits requires Astro to record and retain specified information for each stormwater sample taken, including the sample date and time, a notation describing if Astro collected the sample within the first 30 minutes of stormwater discharge event, an explanation of why Astro could not collect a sample within the first 30 minutes of a stormwater discharge event, the sample location, method of sampling and of preservation, and the individual performing the sampling. Upon information and belief, Astro is in violation of

these conditions as it has not recorded each of these specified items for each sample taken since May 21, 2010.

B. Failure to Retain Records.

Condition S9.C of the Permits requires Astro to retain for a minimum of five years a copy of the Permits, a copy of Astro's coverage letter, records of all sampling information, inspection reports including required documentation, any other documentation of compliance with permit requirements, all equipment calibration records, all BMP maintenance records, all original recordings for continuous sampling instrumentation, copies of all laboratory results, copies of all required reports, and records of all data used to complete the application for the Permits. Upon information and belief, Astro is in violation of these conditions because it has failed to retain records of such information, reports, and other documentation since May 21, 2010.

VIII. REQUEST FOR SWPPP.

Pursuant to Condition S9.F of the 2015 Permit, Waste Action Project hereby requests that Astro Auto Wrecking, LLC provide a copy of, or access to, its SWPPP complete with all incorporated plans, monitoring reports, checklists, and training and inspection logs. The copy of the SWPPP and any other communications about this request should be directed to the undersigned at the letterhead address.

Should Astro fail to provide the requested complete copy of, or access to, its SWPPP as required by Condition S9.F of the 2015 Permit, it will be in violation of that condition, which violation shall also be subject to this Notice of Intent to Sue and any ensuing lawsuit.

IX. CONCLUSION.

The above-described violations reflect those indicated by the information currently available to Waste Action Project. These violations are ongoing. Waste Action Project intends to sue for all violations, including those yet to be uncovered and those committed after the date of this Notice of Intent to Sue.

Under Section 309(d) of the CWA, 33 U.S.C. § 1319(d), each of the above-described violations subjects the violator to a penalty of up to $37,500 per day for each violation. In addition to civil penalties, Waste Action Project will seek injunctive relief to prevent further violations under Sections 505(a) and (d) of the CWA, 33 U.S.C. § 1365(a) and (d), and such other relief as is permitted by law. Also, Section 505(d) of the CWA, 33 U.S.C. § 1365(d), permits prevailing parties to recover costs, including attorney's fees.

Waste Action Project believes that this NOTICE OF INTENT TO SUE sufficiently states grounds for filing suit. Waste Action Project intends, at the close of the 60-day notice period, or shortly thereafter, to file a citizen suit against Astro Auto Wrecking, LLC, under Section 505(a) of the Clean Water Act for the violations described herein.

Waste Action Project is willing to discuss effective remedies for the violations described in this letter and settlement terms during the 60-day notice period. If you wish to pursue such discussions in the absence of litigation, we suggest that you initiate those discussions within ten (10) days of receiving this notice so that a meeting can be arranged and so that negotiations may be completed promptly. We do not intend to delay the filing of a complaint if discussions are continuing when the notice period ends.

Very truly yours,

SMITH & LOWNEY, PLLC

By: 
Elizabeth H. Zultoski

cc: Gina McCarthy, Administrator, U.S. EPA
Dennis McLerran, Region 10 Administrator, U.S. EPA
Maia Bellon, Director, Washington Department of Ecology
Registered Agent, Sherry J. McMilian, 37307 Enchanted Pkwy. S, Federal WA 98003

Date	Precip. (in)
2010	
May	sum
21	0.1
22	0.01
23	0.03
24	0
25	0.06
26	0.23
27	0.11
28	0.45
29	0.06
30	0.11
31	0.31
2010	
Jun	sum
1	0.15
2	0.37
3	0.03
4	0.18
5	0
6	0.33
7	0.01
8	0.25
9	0.25
10	0.18
11	0.1
12	0
13	0
14	0
15	0.19
16	0.18
17	0
18	0
19	0.06
20	0.21
21	0
22	0
23	0
24	0
25	T
26	0
27	0
28	0
29	0
30	0
2010	
Jul	sum
1	0.01
2	0.18
3	0
4	0.11
5	0
6	0
7	0
8	0
9	0
10	T
11	0
12	T
13	0
14	0
15	0
16	0
17	0
18	0
19	0
20	0
21	0
22	0
23	0
24	0
25	0
26	0
27	0
28	0
29	0
30	0
31	0.39
2010	
Sep	sum
1	0
2	0
3	0
4	0.01
5	0
6	0.12
7	0.26
8	0.31
9	0.03
10	0
11	0
12	0
13	0
14	0
15	0.14
16	0.6
17	1.49
18	0.78
19	0.36
20	0.02
21	0
22	0
23	0.26
24	0
25	0
26	0.39
27	0.03
28	T
29	0
30	T
2010	
Oct	sum
1	0
2	0
3	0
4	0
5	0
6	0
7	0
8	0.12
9	1.21
10	0.74
11	0
12	0
13	0
14	0.12
15	0
16	0
17	0
18	0
19	0
20	0
21	T
22	0.05
23	0.38
24	0.72
25	1.08
26	0.19
27	T
28	0.07
29	0.01
30	0.39
31	0.16
2010	
Nov	sum
1	1.56
2	0.02
3	0
4	0
5	0.17
6	0.7
7	0.06
8	0
9	0.22
10	T
11	0.13
12	0
13	0.12
14	0.27
15	0.14
16	0
17	0.17
18	0.2
19	0.06
20	T
21	0.01
22	0.15
23	T
24	0
25	0.01
26	0.29
27	0.01
28	0.02
29	0.1
30	0.64
2010	
Dec	sum
1	T
2	T
3	0
4	0
5	T
6	0.01
7	0.35
8	0.51
9	0.89
10	0
11	1.42
12	2.19
13	0.46
14	0.82
15	0.11
16	0.02
17	0
18	0.08
19	0.14
20	0.03
21	0.01
22	0.01
23	0.25
24	0.44
25	0.32
26	0.09
27	0.44
28	0.01
29	0.09
30	0
31	0
2011	
Jan	sum
1	0
2	0
3	0
4	0.03
5	0.12

Precipitation data—SeaTac Airport

Date	Precip. (in)
6	0.17
7	0.37
8	0.03
9	0.02
10	T
11	0.3
12	0.81
13	0.82
14	0.29
15	0.45
16	0.27
17	0.04
18	0.08
19	0
20	0.05
21	0.51
22	T
23	0.04
24	0.21
25	0
26	0
27	0
28	0.14
29	0.24
30	T
31	0
2011	
Feb	sum
1	0
2	0
3	0.01
4	0.07
5	0.08
6	0.25
7	0.05
8	T
9	0
10	0
11	0
12	0.37
13	0.24
14	0.54
15	0.09
16	0.04
17	0.11
18	0
19	0
20	0
21	0.03
22	0.04
23	0.24
24	T
25	0
26	T
27	0.47
28	0.42
2011	
Mar	sum
1	0.24
2	0.07
3	0.22
4	0.12
5	0.02
6	0
7	T

Date	Precip. (in)
8	0.16
9	1.47
10	0.55
11	T
12	0.41
13	0.33
14	0.12
15	0.37
16	0.09
17	T
18	0.27
19	0
20	0.01
21	0.01
22	T
23	0
24	0.23
25	0.33
26	0.15
27	0.28
28	0.14
29	0.12
30	0.26
31	0.32
2011	
Apr	sum
1	1.13
2	0.37
3	0.06
4	0.24
5	0.23
6	0.12
7	0.08
8	0
9	0.01
10	0.16
11	T
12	0
13	0.17
14	0.4
15	0.09
16	0.06
17	0.01
18	0.01
19	0
20	T
21	T
22	T
23	0
24	0.18
25	0.52
26	0.01
27	0.45
28	0.04
29	T
30	0.13
2011	
May	sum
1	T
2	0.18
3	T
4	0
5	0.03
6	0.13
7	0.04

Date	Precip. (in)
8	0.02
9	0
10	0
11	0.42
12	0
13	0
14	0.97
15	0.81
16	0
17	0
18	0
19	0
20	0
21	0.04
2011	
May	sum
22	0
23	0
24	0
25	0.41
26	0.01
27	0.02
28	0.01
29	0
30	T
31	0.11
2011	
Jun	sum
1	0.17
2	0.08
3	0
4	0
5	0
6	0
7	0.21
8	T
9	0
10	0
11	0
12	0.01
13	0.11
14	0
15	0.06
16	0
17	0
18	0.41
19	0.03
20	0
21	0
22	0
23	0.07
24	0.26
25	0.01
26	0
27	T
28	T
29	T
30	0
2011	
Jul	sum
1	0
2	0
3	0
4	0
5	0

Date	Precip. (in)
6	0
7	0.03
8	0.01
9	0
10	0
11	T
12	0.08
13	T
14	0.02
15	0.02
16	0.35
17	0.07
18	0
19	0
20	0
21	T
22	0
23	0
24	0
25	0.13
26	0
27	0
28	0
29	0
30	0
31	T
2011	
Aug	sum
1	0
2	0
3	0
4	0
5	T
6	0
7	0
8	0
9	0
10	0
11	0
12	0
13	0
14	T
15	0
16	0
17	0
18	0
19	0
20	0
21	0
22	0.12
23	0
24	0
25	0
26	0
27	0
28	0
29	T
30	0.01
31	0
2011	
Sep	sum
1	0
2	0
3	0
4	0

Precipitation data—SeaTac Airport

Date	Precip. (in)	Date	Precip. (in)	Date	Precip. (in)	Date	Precip. (in)
5	0	5	0	5	0.05	6	0.02
6	0	6	0	6	0.1	7	0
7	0	7	0.01	7	T	8	0
8	0	8	T	8	0	9	0.14
9	0	9	T	9	0.17	10	0.41
10	0	10	0	10	0.04	11	0.54
11	0	11	0.23	11	0	12	0.76
12	0	12	0.25	12	0	13	0.37
13	T	13	0.02	13	0	14	0.34
14	0	14	0	14	0.16	15	0.94
15	0	15	0	15	0.21	16	0.33
16	0	16	0.49	16	0.1	17	0.37
17	0.2	17	0.28	17	0.32	18	0.14
18	0.28	18	0.08	18	0.78	19	0.08
19	0.01	19	0	19	0.6	20	0.14
20	0	20	0	20	0.53	21	0.05
21	T	21	0.3	21	0.12	22	0.16
22	T	22	1.76	22	0.24	23	0
23	0	23	0.55	23	T	24	0
24	T	24	0.26	24	0.34	25	T
25	0.19	25	0	25	0.32	26	T
26	0.59	26	0.02	26	0.19	27	0.19
27	0.01	27	0.42	27	0	28	0.05
28	0	28	T	28	T	29	1.08
29	0	29	0.09	29	1.09	30	0.22
30	0.01	30	0	30	0.14	31	0.52
2011		2011		31	0.07	2012	
Oct	sum	Dec	sum	2012		Apr	sum
1	0.02	1	T	Feb	sum	1	0.06
2	0.37	2	0.01	1	0.53	2	0
3	0.1	3	0	2	0	3	0.06
4	0.05	4	0	3	0	4	0
5	0.09	5	0	4	0	5	0.18
6	0.11	6	0	5	0	6	0.01
7	0.06	7	0	6	0	7	0
8	0.02	8	0	7	0.01	8	0
9	0.1	9	0	8	0.11	9	0
10	0.25	10	T	9	0.1	10	T
11	0.89	11	0.02	10	0.1	11	0.09
12	T	12	0	11	0.03	12	0.02
13	0	13	0	12	0.04	13	0
14	0.01	14	T	13	0.45	14	0
15	0	15	0.03	14	0.1	15	T
16	0	16	0	15	0	16	0.32
17	0	17	0	16	0.07	17	0.07
18	0	18	0.19	17	0.68	18	0.07
19	T	19	0	18	0.25	19	0.43
20	T	20	T	19	0	20	0.26
21	0.12	21	0	20	0.12	21	0
22	0.58	22	0	21	0.03	22	T
23	0	23	0.02	22	0.34	23	0
24	0	24	T	23	0	24	0.17
25	0	25	0.03	24	0.45	25	0.42
26	0.02	26	0.05	25	T	26	0.15
27	0	27	0.9	26	0.05	27	0.03
28	0.5	28	0.63	27	0	28	T
29	0	29	0.29	28	0.14	29	0.17
30	0.16	30	0.07	29	0.03	30	0.17
31	T	31	0	2012		2012	
2011		2012		Mar	sum	May	sum
Nov	sum	Jan	sum	1	T	1	0.02
1	0	1	T	2	0.08	2	0.02
2	0.35	2	0.43	3	0	3	0.73
3	0	3	0.03	4	T	4	0.07
4	0.05	4	0.8	5	0.27	5	0

Precipitation data—SeaTac Airport

Date	Precip. (in)	Date	Precip. (in)	Date	Precip. (in)	Date	Precip. (in)
6	0	4	0	3	0	3	0.02
7	0	5	0	4	0	4	0.32
8	0	6	0	5	0	5	0.03
9	T	7	0	6	0	6	0.01
10	0	8	T	7	0	7	T
11	0	9	0.06	8	0	8	T
12	0	10	0	9	0.01	9	T
13	0	11	0	10	0.01	10	T
14	0	12	0	11	0	11	0.6
15	0	13	0.02	12	0	12	0.14
16	0	14	T	13	0	13	0.21
17	T	15	T	14	0	14	0.03
18	T	16	0.01	15	0	15	0
19	0	17	0	16	0	16	0.22
20	0.25	18	0	17	0	17	0.24
21	0.55	19	0	18	0	18	0.31
2012		20	0.6	19	0	19	2.13
May	sum	21	0	20	0	20	0.15
22	0.24	22	0.04	21	T	21	0.44
23	0.01	23	T	22	0.01	22	T
24	T	24	0	23	0	23	1.26
25	T	25	0	24	0	24	T
26	0	26	0	25	0	25	0
27	0	27	0	26	0	26	0
28	T	28	T	27	0	27	0
29	0	29	0	28	T	28	0.11
30	0.01	30	0	29	0	29	0.06
31	0.15	31	0	30	0	30	1.4
2012		2012		2012		2012	
Jun	sum	Aug	sum	Oct	sum	Dec	sum
1	0.26	1	0	1	0	1	0.16
2	0.01	2	0	2	0	2	0.77
3	0	3	0	3	0	3	0.51
4	0.05	4	0	4	0	4	0.56
5	0.63	5	0	5	0	5	0.06
6	0	6	T	6	0	6	0.06
7	0.65	7	0	7	0	7	0.04
8	0.06	8	0	8	0	8	0
9	T	9	0	9	0	9	0.06
10	0	10	0	10	0	10	0.02
11	T	11	0	11	0	11	0.12
12	0.03	12	0	12	0.08	12	0.32
13	0	13	0	13	0.19	13	0.09
14	0	14	0	14	0.65	14	0.31
15	0	15	0	15	0.31	15	0.21
16	T	16	0	16	0	16	0.89
17	0	17	0	17	0	17	0.08
18	0.12	18	0	18	0.82	18	0.13
19	0.04	19	0	19	0.19	19	0.54
20	0	20	0	20	0.02	20	0.52
21	0	21	T	21	0.25	21	0.07
22	0.62	22	0	22	0.35	22	0.13
23	0.34	23	0	23	T	23	0.26
24	0	24	0	24	0.28	24	0.01
25	0.02	25	0	25	0	25	0.53
26	T	26	0	26	0.06	26	0.18
27	0	27	0	27	0.91	27	0.16
28	T	28	0	28	0.24	28	T
29	0.01	29	0	29	0.43	29	0.06
30	0.12	30	0	30	1.36	30	0
2012		31	0	31	0.57	31	0
Jul	sum	2012		2012		2013	
1	T	Sep	sum	Nov	sum	Jan	sum
2	0.08	1	0	1	0.38	1	0
3	0.23	2	0	2	0.22	2	0

Precipitation data—SeaTac Airport

Date	Precip. (in)	Date	Precip. (in)	Date	Precip. (in)	Date	Precip. (in)
3	0.16	5	T	5	0	3	0
4	0.1	6	0.47	6	0	4	0
5	0.12	7	0.29	7	0	5	0
6	0.08	8	0	8	0	6	0
7	0.09	9	0	9	0	7	0
8	0.64	10	0.03	10	0	8	0
9	1.51	11	0.05	11	0	9	0
10	0.01	12	0.08	12	0.26	10	0
11	0	13	0.09	13	0.13	11	0
12	0	14	0.11	14	0	12	0
13	0	15	T	15	0.04	13	0
14	0	16	0.17	16	T	14	0
15	0	17	0	17	0.02	15	0
16	0	18	T	18	T	16	T
17	0	19	0.46	19	T	17	T
18	0	20	0.39	20	0	18	0
19	0	21	0.32	21	0.54	19	0
20	0	22	0	2013		20	0
21	0	23	0	May	sum	21	0
22	0	24	0	22	0.54	22	0
23	0.2	25	0	23	0.16	23	0
24	0.23	26	0	24	0.01	24	0
25	0.12	27	0.01	25	T	25	0
26	0.09	28	0.08	26	0.06	26	0
27	0.07	29	T	27	0.38	27	0
28	0.31	30	0	28	0.02	28	0
29	0.17	31	0	29	0.22	29	T
30	0.14	2013		30	T	30	0
31	0.12	Apr	sum	31	0	31	0
2013		1	0	2013		2013	
Feb	sum	2	0	Jun	sum	Aug	sum
1	0.01	3	0	1	T	1	0
2	0	4	0.33	2	0.04	2	0.08
3	0.09	5	0.73	3	0	3	T
4	T	6	0.5	4	0	4	0
5	0.13	7	1.54	5	0	5	0
6	0.04	8	0.03	6	0	6	0
7	0.05	9	T	7	T	7	0
8	0	10	0.37	8	0	8	0
9	0.01	11	0.06	9	0	9	T
10	0	12	0.38	10	0	10	0.09
11	0.01	13	0.37	11	0	11	0
12	0.04	14	0.23	12	0.01	12	0
13	0.09	15	T	13	0	13	0
14	0.04	16	0.01	14	0	14	0.03
15	0	17	0	15	0	15	0.07
16	T	18	0.21	16	0	16	0
17	T	19	0.81	17	T	17	0
18	T	20	T	18	0.01	18	0
19	0	21	0.13	19	T	19	0
20	0.06	22	0	20	0.12	20	0
21	0.02	23	0	21	0.01	21	0
22	0.37	24	0	22	0	22	0
23	0.01	25	0	23	0.31	23	T
24	T	26	0	24	0.19	24	0
25	0.09	27	T	25	0.39	25	0.01
26	0.02	28	0.04	26	0.08	26	0.04
27	0.18	29	0.15	27	0.14	27	0.05
28	0.32	30	T	28	0	28	0.22
2013		2013		29	0	29	0.76
Mar	sum	May	sum	30	0	30	0
1	0.16	1	0	2013		31	0
2	0.03	2	0	Jul	sum	2013	
3	0	3	0	1	0	Sep	sum
4	0	4	0	2	0	1	0

Precipitation data—SeaTac Airport

Date	Precip. (in)	Date	Precip. (in)	Date	Precip. (in)	Date	Precip. (in)
2	T	2	0.5	2	0.16	4	0.65
3	0.09	3	0.02	3	0.06	5	1.84
4	0.01	4	T	4	0	6	0.12
5	1.09	5	0.1	5	0	7	0
6	0.84	6	0.15	6	0.01	8	1.27
7	0	7	1.18	7	0.48	9	0.17
8	0	8	0	8	0.38	10	0.74
9	0	9	0.07	9	0.23	11	0
10	0	10	T	10	0.17	12	0
11	0	11	0	11	0.84	13	0
12	0	12	0.16	12	0.06	14	0.27
13	0	13	0	13	0	15	0.32
14	0	14	0.05	14	T	16	1.09
15	0.13	15	0.12	15	0	17	0.01
16	0.01	16	0	16	0	18	T
17	T	17	0.21	17	0	19	0.02
18	0	18	1.03	18	0	20	0
19	0	19	0.04	19	0	21	0
20	0.14	20	0	20	0	22	0
21	T	21	0	21	0	23	0
22	0.53	22	0	22	0.02	24	0
23	0.11	23	0	23	0	25	0.16
24	T	24	0	24	0	26	0.14
25	0.08	25	0	25	0	27	0.01
26	0	26	T	26	0	28	0.87
27	0.04	27	0	27	0	29	0.55
28	1.71	28	0	28	0.35	30	0
29	0.66	29	0.02	29	0.85	31	0
30	0.73	30	0.09	30	0	2014	
2013		2013		31	0.09	Apr	sum
Oct	sum	Dec	sum	2014		1	0
1	0.31	1	0.12	Feb	sum	2	0
2	0.21	2	0.18	1	0.08	3	0.1
3	0.03	3	0	2	0	4	T
4	0	4	0	3	0	5	0.18
5	0	5	0	4	0	6	0
6	0.16	6	0	5	0	7	0
7	0.02	7	0	6	T	8	0.18
8	0.27	8	0	7	T	9	0
9	0	9	0	8	0.2	10	0
10	0.04	10	0	9	0.02	11	0
11	0.36	11	0	10	0.72	12	0
12	0.04	12	0.27	11	0.67	13	0
13	0	13	0.02	12	0.18	14	0
14	0	14	T	13	0.07	15	0.02
15	0	15	0.05	14	0.37	16	0.43
16	0	16	0.01	15	0.46	17	0.73
17	0	17	0	16	1.04	18	0
18	0	18	0.05	17	0.57	19	0.54
19	0	19	0	18	0.6	20	0
20	0	20	0.22	19	0.04	21	0.2
21	0	21	0.22	20	0.12	22	0.56
22	0	22	0.42	21	0.11	23	0.35
23	0	23	0.06	22	0.1	24	0.49
24	0	24	0	23	0.24	25	0
25	0	25	0	24	0.51	26	0.13
26	0	26	0	25	0.01	27	0.27
27	0.07	27	0.01	26	0	28	0
28	0	28	0	27	0	29	0
29	0	29	0	28	0	30	0
30	0.02	30	0.01	2014		2014	
31	0.01	31	0.02	Mar	sum	May	sum
2013		2014		1	0.02	1	0
Nov	sum	Jan	sum	2	0.75	2	T
1	0.05	1	T	3	0.42	3	1.31

Precipitation data—SeaTac Airport

Date	Precip. (in)	Date	Precip. (in)	Date	Precip. (in)	Date	Precip. (in)
4	0.63	2	0	1	0	1	0
5	0.2	3	0	2	0.12	2	0.07
6	0	4	0	3	0	3	0.43
7	0	5	0	4	0	4	0.16
8	0.54	6	0	5	0	5	0.19
9	0.08	7	0	6	0	6	0.16
10	0.02	8	0	7	0	7	0
11	0	9	0	8	T	8	0
12	0	10	0	9	T	9	0.2
13	0	11	0	10	0	10	0
14	0	12	0	11	0	11	0
15	0	13	T	12	0	12	0
16	0	14	0	13	0	13	0
17	0	15	0	14	0	14	0
18	T	16	0	15	0	15	0
19	0	17	0	16	T	16	0
20	0	18	0	17	0.02	17	0
21	0	19	0	18	0.01	18	0
2014		20	0	19	0	19	T
May	sum	21	0	20	0	20	0.14
22	0	22	0.01	21	0	21	0.6
23	0.15	23	0.76	22	0.01	22	0.02
24	0	24	T	23	0.72	23	0.47
25	0.22	25	0	24	0.8	24	0.05
26	0	26	0	25	0.17	25	0.72
27	0	27	0	26	0.35	26	0.01
28	T	28	0	27	0	27	0.13
29	0	29	0	28	0	28	1.35
30	0	30	0	29	0.03	29	0.14
31	0	31	0	30	T	30	0
2014		2014		2014		2014	
Jun	sum	Aug	sum	Oct	sum	Dec	sum
1	0	1	T	1	0	1	0
2	0	2	0.02	2	0	2	0
3	0	3	0	3	0	3	0
4	0	4	0	4	0	4	0.03
5	0	5	0	5	0	5	0.12
6	0	6	0	6	0	6	0.29
7	0	7	0	7	0	7	0
8	0	8	0	8	0	8	0.36
9	T	9	0	9	T	9	0.39
10	0	10	0	10	0.01	10	0.51
11	0	11	0.02	11	0.29	11	0.27
12	0.07	12	0.5	12	T	12	T
13	0.25	13	0.85	13	0.3	13	T
14	0	14	T	14	0.28	14	0
15	0.02	15	0.04	15	0.34	15	0
16	0.14	16	0	16	T	16	T
17	0.05	17	0	17	0.13	17	0.11
18	0	18	0	18	0.59	18	0.51
19	0.03	19	0	19	0	19	0.12
20	0.01	20	0	20	0.46	20	0.77
21	0	21	0	21	0.04	21	0
22	0	22	0	22	1.26	22	0
23	T	23	0	23	0.37	23	0.81
24	0	24	0	24	0.16	24	0.21
25	0	25	0	25	0.24	25	0
26	T	26	0	26	0.06	26	0
27	0.07	27	0	27	0.03	27	0.13
28	0.09	28	0	28	0.5	28	0.16
29	T	29	T	29	0.02	29	0
30	0	30	0.33	30	1	30	0
2014		31	0.05	31	0.67	31	0
Jul	sum	2014		2014		2015	
1	0	Sep	sum	Nov	sum	Jan	sum

Precipitation data—SeaTac Airport

Date	Precip. (in)	Date	Precip. (in)	Date	Precip. (in)	Date	Precip. (in)
1	0	3	0				
2	0.06	4	0				
3	T	5	0				
4	0.4	6	0				
5	0.32	7	0				
6	0	8	0				
7	0	9	0				
8	0	10	0.03				
9	0.01	11	0.08				
10	0.23						
11	0.06						
12	T						
13	0						
14	0						
15	0.38						
16	T						
17	1.03						
18	0.84						
19	0.02						
20	0						
21	0						
22	0.03						
23	0.23						
24	0.02						
25	0						
26	0						
27	0.03						
28	T						
29	0						
30	0						
31	0						
2015							
Feb	sum						
1	0.06						
2	0.29						
3	0.05						
4	0.33						
5	1.03						
6	0.68						
7	0.93						
8	0.14						
9	0.24						
10	0.01						
11	T						
12	0.04						
13	0						
14	0.01						
15	0						
16	0						
17	0						
18	0						
19	0.18						
20	0.03						
21	0						
22	0						
23	0						
24	0						
25	0.16						
26	0.37						
27	0.72						
28	0						
2015							
Mar	sum						
1	0						
2	0						

Precipitation data—SeaTac Airport